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8 Attorneys for Debtor

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12 UNITED STATES BANKRUPTCY COURT  
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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15 In re  
16 Micha Star Liberty

17  
18 Debtor.

19 Case No. 24-40401 WJL

20 Chapter 13

21 **STIPULATION TO CONTINUE  
HEARING ON MOTION TO  
EXTEND STAY TO NON-DEBTOR  
DEFENDANTS TO LITIGATION**

22 Date: May 8, 2024

23 Time: 10:30 a.m.

24 Ctrm: 220

25 U.S. Bankruptcy Court  
1300 Clay Street, 2<sup>nd</sup> Fl.  
Oakland, California

26 Micha Liberty, Debtor, and Lisa Bloom and The Bloom Firm (“Creditors” or “Bloom”), by  
27 and through their respective counsel, hereby stipulate as follows:

28 1. On March 22, 2024 the Debtor filed this Chapter 13 bankruptcy.  
2. On April 3, 2024, Debtor filed a Motion to Extend the Stay to Non-Debtor  
Defendants to Litigation, which was originally set for hearing on April 17, 2024 and was  
continued by this Court to May 8, 2024.

29 3. The parties are currently in settlement negotiations and have agreed that Debtor  
shall continue this hearing and Bloom will take no actions in the two pending state court actions; a  
fraudulent conveyance action entitled *The Bloom Firm, a Professional Corporation vs. Michael*

1 *Star Liberty, an individual, Liberty Law Office, Inc., Liberty Law, Inc., and Linda Culler, Trustee*  
2 *of Rising Start Trust dated October 15, 2015 filed as case 23CV047497 in the Alameda County*  
3 *Superior Court (the “FT SCA”) and post-judgment collection on a judgment entered in a*  
4 *declaratory relief action entitled *Micha Star Liberty, an individual; and Liberty Law Office, Inc.**  
5 *vs. Lisa Bloom and The Bloom Firm filed as case HG20079536 in the Alameda County Superior*  
6 *Court (the “Dec Relief SCA”) until the continued hearing date or such time as either party*  
7 *provides notice that settlement is futile.*

8       4.      The parties stipulate that the hearing scheduled for May 8, 2024 at 10:30 a.m. shall  
9 be continued to May 22, 2024 to allow parties time to continue settlement negotiations.

10 Dated: May 7, 2024

KORNFIELD, NYBERG, BENDES, KUHNER,  
LITTLE P.C.

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By:/s/ SARAH LAMPI LITTLE

(Bar No. 215635)

Attorneys for Debtor

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Dated: May 7, 2024

CHORA YOUNG AND MANASSERIAN LLP

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By:/s/ Paul Young

Paul Young

Attorneys for Creditor